

EXHIBIT 19

From: Major, Amanda
Sent: Tuesday, October 9, 2018 4:40 PM
To: Slusarczyk, Dominik
Cc: #VLSI-Intel [Int]; WH Intel-VLSI Service
Subject: RE: VLSI v. Intel: Responses to Fortress Subpoena

Dear Dominik – We are unaware of any basis for your understanding that the issues addressed in my September 25 letter had somehow been resolved. We certainly never told you that. When we most recently discussed Fortress’s privilege log, we explained that Intel would consider Fortress’s position. We followed up by pointing out case law that indicates that Fortress’s failure to serve a log on a timely basis effects a waiver of any privilege, asking that Fortress commit to providing a log by October 12, and asking for a meet-and-confer about Fortress’s privilege log as well as the deficiencies in Fortress’s document production identified in my September 25 letter. Before we received your email last evening, Fortress had provided no response to the substantive issues addressed in my letter or to our request for a meet-and-confer. We therefore do not see how Fortress could sincerely have been under the impression the issues discussed in that letter had been resolved.

In any event, if it remains Fortress’s position that it will not produce a privilege log until August 2019, Intel intends to approach the Court to seek an order compelling production of all responsive materials withheld on the basis of privilege given Fortress’s failure to log such documents in a timely fashion. Please confirm Fortress’s position. Please also identify times when Fortress is available for a meet-and-confer Wednesday or Friday of this week to discuss the document production deficiencies addressed in my September 25 letter.

Finally, we have now reached the point in time that Fortress expected to provide its last email production. When will we receive that production?

Regards,
Amanda

From: Slusarczyk, Dominik <DSlusarczyk@irell.com>
Sent: Monday, October 8, 2018 10:22 PM
To: Major, Amanda <Amanda.Major@wilmerhale.com>
Cc: #VLSI-Intel [Int] <VLSI-Intel@irell.com>; WH Intel-VLSI Service <WHIntel-VLSIService@wilmerhale.com>
Subject: RE: VLSI v. Intel: Responses to Fortress Subpoena

Dear Amanda,

I thought we discussed these issues and reached resolution on previous calls—including Intel’s many questions about Fortress’s privilege log. Notwithstanding, I am available to meet and confer on or after 4 PM Pacific tomorrow (Tuesday), to the extent there are any questions that warrant our discussion. I could also find time on Wednesday if needed. Thank you.

Dominik

From: Major, Amanda [<mailto:Amanda.Major@wilmerhale.com>]
Sent: Friday, October 05, 2018 4:53 PM
To: Slusarczyk, Dominik
Cc: #VLSI-Intel [Int]; WH Intel-VLSI Service
Subject: RE: VLSI v. Intel: Responses to Fortress Subpoena

Dear Dominik – We have not received a response to our September 25, 2018 regarding Fortress’s document production and privilege log, or a response to our request for times to meet and confer this week. Please let us know your availability for a meet-and-confer Monday. At a minimum, please be prepared to let us know whether Fortress agrees to provide a privilege log now or whether it continues to take the position that it will not provide a log until August 2019.

Regards,
Amanda

From: Major, Amanda
Sent: Tuesday, September 25, 2018 6:34 PM
To: 'Slusarczyk, Dominik' <DSlusarczyk@irell.com>
Cc: #VLSI-Intel [Int] <VLSI-Intel@irell.com>; WH Intel-VLSI Service <WHIntel-VLSIService@wilmerhale.com>
Subject: VLSI v. Intel: Responses to Fortress Subpoena

Dear Dominik –

Please see the attached correspondence.

Regards,
Amanda

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